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UNITED STATES DISTRICT COURT

DISTRICT OF, NEVADA

HILLCREST INVESTMENTS, LTD., a
Canadian Corporation; AMERGOSA
ENTERPRISE, LLC.,
Plaintiffs,

vs.

AMERICAN BORATE COMPANY a foreign
corporation; AMERICAN BORATE COMPANY
OF TEXAS a foreign corporation, STATE
ENGINEER, STATE OF NEVADA,
DEPARTMENT OF CONSERVATION AND
NATURAL RESOURCES, DIVISION OF
WATER RESOURCES, A Nevada Political
Subdivision; RAMM Corporation, a Nevada
Corporation; UNITED STATES FISH AND
WILD SERVICE a division of the UNITED
STATES; NATIONAL PARK SERVICE, a
division of the UNITED STATES; and DOES I-
V, ROES VI-X,

Defendants.

Case No 2:21-cv-00964-RFB-NJK

**STIPULATION TO EXTEND DEADLINE
TO FILE RESPONSE TO
DEFENDANTS' AMERICAN BORATE
COMPANY AND AMERICAN BORATE
COMPANY OF TEXAS' RENEWED
MOTION FOR SANCTIONS AND REPLY
TO RESPONSE TO MOTION TO
RECONSIDER**

(SIXTH REQUEST)

COMES NOW, Plaintiffs **HILLCREST INVESTMENTS, LTD. and AMERGOSA
ENTERPRISE, LLC** ("Plaintiffs") and Defendants, **AMERICAN BORATE COMPANY AND
AMERICAN BORATE COMPANY OF TEXAS** (hereafter "American Borate") by and
through their respective attorneys of record hereby stipulate and agree as follows:

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1 On August 15, 2022, the Court granted the parties' stipulation (fifth request) for an
2 extension of time for Plaintiffs to file their Response to American Borate's Renewed Motion for
3 Sanctions ("Response") and their Reply to the Opposition to Plaintiffs' Motion to Reconsider
4 ("Reply"). ECF No. 74. The new due date for both the Response and the Reply is August 19,
5 2022. *Id.*

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The parties now make this sixth request for an extension for the deadline for Plaintiffs to file the Response and the Reply. The parties request this extension to allow the parties to discuss a potential resolution of all disputes between American Borate and Plaintiffs, including American Borate's Motion for Sanctions and Plaintiffs' Motion to Reconsider, and all other issues with this case. If the settlement negotiations are successful, it would result in dismissal of American Borate from this case and the appeal. Thus, the parties request a two-week extension from today until and including September 2, 2022 to continue discussions of a potential resolution of all disputes between the Plaintiffs and American Borate. This is the parties' sixth request.

LEONARD LAW PC

/s/ Debbie Leonard

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Attorney for American Borate
Company and American Borate
Company of Texas

**LAW OFFICES OF BYRON
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/s/ Byron E. Thomas

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Attorney for Plaintiffs

IT IS SO ORDERED:



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 22nd day of August, 2022.